

EXHIBIT 29

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UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

No. 04-CV-11948-RGS

SEYED MOHSEN HOSSEINI-SEDEHY,

Plaintiff

vs.

ERIN T. WITHINGTON and the CITY
OF BOSTON,

Defendants

DEPOSITION OF ERIN T. WITHINGTON

Thursday, March 31, 2005

10:00 a.m. - 4:32 p.m.

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14 (Pages 50 to 53)

Erin T. Withington - March 31, 2005

<p style="text-align: right;">50</p> <p>1 Q. You stated after Mr. Bavis gave you a call 2 on that day that you got the warrant you typed 3 something up? 4 A. I typed up the application for the warrant. 5 Q. Application? 6 A. Yes. 7 Q. And other than speaking with Bavis and 8 typing up the application for the warrant on that 9 morning before you went to the court, did you do 10 anything else with respect to the investigation? 11 A. I asked Detective Barry and Detective Lembo 12 if they were available to come with me because of 13 the fact that I was very visibly pregnant and was 14 not supposed to be out arresting people. 15 Q. Asked them to come with you where? 16 A. To pick up the warrant and then to arrest 17 Mr. Hosseini. 18 Q. And did Detectives Barry and Lembo come 19 with you? 20 A. Yes. 21 Q. Do you remember at any time before you got 22 the warrant did you inquire whether Mr. Hosseini had 23 a criminal record in Massachusetts? 24 A. Did I BOP him, basically?</p>	<p style="text-align: right;">52</p> <p>1 warrant? 2 A. In terms of what? 3 Q. That we haven't talked about. 4 A. Not that I know of. 5 Q. Okay. You had mentioned that you had gone 6 to some training at some point while Mr. Bavis was 7 calling you? 8 A. Yes. I believe I was out of the office. 9 Q. Okay. And you also mentioned that you -- I 10 think you became a police officer in 1995, June 28? 11 A. In Boston, yes. 12 Q. Were you a police officer before that? 13 A. Yes. 14 Q. I will just ask you some background 15 questions, then, about your professional experience. 16 Do you have a college degree? 17 A. Yes, I do. 18 Q. From where? 19 A. I have a master's degree from Anna Maria. 20 Q. Master's in criminal justice? 21 A. Yes. 22 Q. And where did you get your undergraduate 23 degree? 24 A. Suffolk University.</p>
<p style="text-align: right;">51</p> <p>1 Q. Yes. 2 A. Yes, I did. I ran a Board of Probation 3 check on him, yes. 4 Q. BOP is Board of Probation? 5 A. Yes. I am sorry. 6 Q. Do you remember when you did that? 7 A. At some point when the reports go in 8 because we do usually put it inside the file. 9 Q. And was that before you got the warrant? 10 A. Yes. 11 Q. And what did the Board of Probation report 12 say? 13 A. That he had never been arrested. 14 Q. And what was the purpose of asking for the 15 Board of Probation report? 16 A. It's just something that we standardly put 17 in our files in regards to suspects. 18 Q. And for what purpose? Do you know? 19 A. In case anyone at any point has to take 20 over the investigation or if there is a search 21 warrant we would like to know if they have any 22 weapons charges, anything hanging over them. 23 Q. Was there any other action that you took 24 regarding this investigation before you got the</p>	<p style="text-align: right;">53</p> <p>1 Q. And when did you get that degree from 2 Suffolk University? 3 A. 1991. 4 Q. What did you major in? 5 A. Sociology with a track in criminal justice. 6 A. Did you say track in criminal justice? 7 A. Yes. 8 Q. And when did you get your degree from Anna 9 Maria? 10 A. Either in 1998 or 1999. 11 Q. Did you go full time to Suffolk, full time 12 days? 13 A. Yes. 14 Q. After you graduated from Suffolk in 1991 15 what jobs did you have? What job did you take, 16 first job? 17 A. I was a social worker with the Department 18 of Mental Retardation out at the NWW Committee in 19 Newton. 20 Q. And what was the department there? 21 A. Mental Retardation. 22 Q. And what was the job? 23 A. I was a caseworker. 24 Q. And you had mentioned a couple of other</p>